

BEFORE THE POSTAL REGULATORY COMMISSION, WASHINGTON, D.C. 20268

In the Matter of the Determination to Close: The Viola, ID 83872 Post Office. Docket No. A2012-71

Submitted Online December 18, 2011

I am writing to confirm my Nov 7, 2011 appeal by the Postal Service to close the Viola, ID Post Office.

The Postal Service has indicated that it can provide comparable service to the patrons of the Viola Post Office by rural route service, the Moscow, ID Post office and Cluster Box Units. Based on the figures stated in the final Postal Service Determination dated 10/14/2011 (determination) and contrary to the determination, this action will decrease service, cause considerable hardship to the patrons and generate zero, or most likely negative cost savings.

Why?

- The current rural route carrier already has a full day's work. Adding 52 new boxes and 2 hours of work to the rural route workload will require hiring a second rural route carrier. Rural route carriers have a higher salary than the employee currently operating the Viola Post Office. With additional retail services provided by the rural route carrier, service will be much less efficient than what is provided in the Viola Post Office. The increased workload will require more than the 2 hours stated in the determination.
- Rural mailboxes are not secure and we were informed that the rural route carrier would not carry keys to open locked boxes. Many patrons receive mail-order prescriptions, checks and parcels that would be vulnerable to theft while they are away working.
- The population of the Viola area is increasing even with the downturn in the economy. When that changes, growth will accelerate. The Viola Post Office can absorb this increase in patrons. A single rural route carrier cannot.
- The option of obtaining a Post Office box in Palouse, WA is not viable. Palouse WA is 6 miles in the opposite direction from the travel pattern of 99% of the Viola Post Office patrons. No one will use this option and thus it should not have even been listed in the determination. At a minimum driving to the Palouse PO will NOT save customers time and energy. Further, this road is often drifted shut or icy in winter.
- The determination indicates there are 316 boxes available at the Moscow Post Office. What is not mentioned is that the Postal Service is closing The University of Idaho branch Post Office in Moscow. The patrons of the branch post office will need to move their box to the main office, thus greatly reducing the number of boxes available for the Viola PO patrons.
- The Moscow Post Office is in a very congested section of downtown and has inadequate parking for its current service level.
- The determination also fails to mention that GSA is selling the building where the Moscow Post Office is located. I believe the Post Office lease expires in 2013. So one must consider that the new owners of the building might ask the Postal Service to vacate?

- The Moscow Post Office is classified as an EAS level 55. It has fewer hours than the Viola PO and has notoriously poor service already. Adding the Moscow Branch patrons and the Viola patrons will make a bad situation worse.
- The proposal to substitute Cluster Box Units (CBUs) for the 54 patrons who currently have a PO Box at the Viola Post Office is very vague. There is no mention of how many CBUs will be installed. The Viola Post Office already functions as a secure CBU. The determination did not provide any cost analysis on the installation of the CBUs. Their installation and maintenance will surely have an expense. In addition the determination indicated that having a box in a CBU will not cost the postal patron. Thus the rental box fee currently paid by the 54 box holders will vanish for those who choose the CBU option over a Moscow PO Box. This loss of revenue did not show up in the economic analysis of the determination. Distributing mail to these boxes would be no more efficient than the current mailboxes.
- At the date of the announced closing, Nov. 15, 2011, there was no CBU and no explanation to patrons or the postmistress of what alternative service was to be provided.
- It must be restated that Viola does not have any storefront business and thus a Community Post Office is not an option. The Postal Services determination of Effect on Community is factually incorrect.
- First and foremost while the Postal Service may have met the letter of the law by mailing out questionnaires and having a meeting, IT DID NOT MEET the intent of the law. Numerous patrons DID NOT receive the questionnaire. The notice of the meeting was very limited and many patrons did not see it, as it was not advertised in the local paper. The meeting was scheduled for the convenience of the Postal Service employees and not Patrons. Having a meeting at 4PM in Moscow eliminated the option for most working patrons to attend.
- The determination indicates there are no businesses or organizations in the service area. The owner of the building leased to the Postal Service has a contracting business; there is an electrical business and two trucking businesses downtown. In addition there is a non-profit organization. Further, farms are businesses and many of the box-holders are farmers. We have a farm and consulting business that use our PO Box address. Many of our neighbors have similar enterprises.
- The Postal Service did not mention the installation of the handicap upgrades: slab, ramp, railing, counter, door knobs and accessible bathroom that were added to the Viola Post Office at Postal Service expense following the public meeting. The Postal Service Landlord was not even notified of these improvements until someone called and told them someone was removing their flower bed from in front of the Post Office.

The Postal Service determination of the Effect on Employees is factually incorrect.

- The current employee will lose her job, which she has held on a temporary basis for 5 years.
- The workload of the rural route carrier will greatly increase.

The Postal Service determination of Economic Savings is factually incorrect.

- The effect on employees indicates the current employee “may be separated from the Postal Service”. If she is transferred to Moscow, or if a second rural route carrier is needed there will be no cost savings from salary reduction.
- The stated salary for the postmistress is approximately \$7,000. more than her salary level and she does not receive any of the budgeted benefits.
- The economic savings does not include the loss of PO Box rent.
- The economic savings does not address the additional cost of installing and maintaining CBUs.
- The economic savings does not address costs of early termination of the facility lease.
- The economic savings does not address the cost to remove all of the new handicap installations if the landlord requests that the Postal Service return the facility to “like” condition at the initiation of the lease.

The Postal Service determination of Other Factors is factually incorrect.

- There is no substantive analysis of overall impact closing the Post Office will have on the Viola community.
- Most Viola postal patrons do not have full access to alternative communication networks. Our topography limits cell phone access and many patrons have only dial-up internet service, if any. Satellite service is beyond the means of many residents. Closing the Post Office will disproportionately disadvantage rural residents.
- There is no analysis of future growth and service needs in the Viola service area.

In Summary:

It is very difficult for a non-attorney to determine if the Postal Service acted in accordance with the laws governing the Postal Service. My hunch is they have met the minimal requirements but going through the motions of questionnaires and a public meeting were only window dressing on a predetermined decision. In addition, the Postal Service Determination to close the Viola Post Office contained numerous factual errors and did not effectively evaluate the effect of closure on the Patrons. Finally, closing the Viola Post Office will not save the Postal Service any funds and may in fact cost more than leaving it open.

I understand that the Postal Regulatory Commission cannot overturn the Postal Service’s decision to close the Viola Post Office. However it can, and I hereby request, that the Postal Regulatory Commission remand the decision to close the Viola Post Office back to the Postal Service for reconsideration using accurate information. And if it is within the jurisdiction of the Postal Regulatory Commission, the postal service should be required to provide the patrons of the Viola Post Office with extensive details on cost savings and proposed alternatives if the Viola Post Office is closed.

Thank you for taking the time to review my statement.

Dan Hardesty /s/